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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

TREJO, JESUS, an individual, on behalf
of himself and all others similarly
situated;

Plaintiff,

v.

F & E AIRCRAFT MAINTENANCE
(MIAMI), LLC, a Delaware
corporation; and DOES 1 through 10,
inclusive;

Defendants.

CASE NO.: 2:24-CV-00931-MRA (ASx)

JOINT RULE 26(f) REPORT

Hon. Monica Ramirez Almandi
Dept: 14

Date: 03/25/24
Time: 9:00 A.M.

1 Plaintiff JESUS TREJO and Defendant F & E AIRCRAFT MAINTENANCE
2 (MIAMI), LLC, met and conferred on February 29, 2024, as required by Federal
3 Rules of Court, Rule 26(f) and Local Rule 26-1, and hereby submit the following Joint
4 Rule 26(f) Report:

5 **JOINT RULE 26(f) REPORT**

6 **a. COMPLEXITY OF CASE**

7 This is a fairly straightforward wage and hour Class/PAGA action involving
8 approximately 285 putative Class Members. Plaintiff and Defendant have no
9 objection to the use of the procedures set forth in Chapter, 21, Class Actions, Manual
10 for Complex Litigation.

11 **b. MOTION SCHEDULE**

12 Plaintiff requests a deadline to move for class certification approximately 8 -12
13 months from the Case Management Conference.

14 Defendant shall file any motion for summary judgment within the time set forth
15 by the Federal Rules of Civil Procedure following a ruling on Plaintiff's motion for
16 class certification.

17 **c. ADR**

18 Plaintiff and Defendant are willing to attempt private mediation and to pay 50
19 % of the costs thereof.

20 **d. TRIAL ESTIMATE**

21 5-7 days

22 **e. ADDITIONAL PARTIES**

23 Plaintiff does not anticipate adding additional parties at this time.

24 **f. EXPERT WITNESSES**

25 The parties agree to the timing for expert disclosures as set forth in Federal
26 Rules of Civil Procedure, Rule 26(a)(2).

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1 **g. DISCOVERY PLAN**

2 (A) The parties have agreed to a March 29, 2024, deadline for initial
3 disclosures under Rule 26(a);

4 (B) Plaintiff shall require contact information and the time and payroll
5 records for the putative Class Members. Plaintiff shall also require Defendant's
6 Employee Handbook(s), and the relevant wage and hour related policies, utilized
7 during the Class Period. Plaintiff and Defendant propose that discovery be conducted
8 in phases, with a first phase of approximately 8-12 months limited to issues related to
9 Class certification followed by a second phase of approximately 6-8 months limited
10 to merits based discovery.

11 (C) Plaintiff is unaware of any issues about disclosure, discovery, or
12 preservation of electronically stored information.


13 (D) Plaintiff is unaware of any issues about claims of privilege or of
14 protection as trial-preparation materials. Plaintiff and Defendant agree to utilize
15 Federal Rule of Evidence 502 in connection with any inadvertent disclosure of
16 privileged materials.

17 (E) Neither Plaintiff nor Defendant believe that any changes should be made
18 in the limitations on discovery.

19 (F) At this time, Plaintiff and Defendant are unaware of any need for
20 additional order under Rule 26(c) or 16(b) and(c).

21 Dated: March 5, 2024

BLAKE JONES LAW, PC.

22
23 By: 
24 Blake R. Jones
25 Attorneys for Plaintiff
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1 Dated: March 5, 2024

KEATING MUETHING & KLEKAMP

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3 By: /S/

Kasey L. Bond

4 Attorneys for Defendant